

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

ANDREW PERRONG, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CHARLES BARATTA LLC, a New York
limited liability company, SLATER SLATER
SCHULMAN LLP, a New York limited
liability partnership, ARKADY
FREKHTMAN ATTORNEY AT LAW, P.C.
d/b/a FREKHTMAN & ASSOCIATES, a
New York professional corporation,
FLEMING NOLEN & JEZ LLP, a Texas
limited liability partnership, and LAW
OFFICE OF COHEN & JAFFE, LLP, a New
York limited liability partnership

Defendants.

:
: Civil File No. 2:21-cv-00996-JS-AYS
:

:
: **NOTICE OF INTENT TO OPPOSE**
: **PRO HAC VICE APPLICATION**
: **FILED BY AMBROSE W.**
: **WOTORSON, JR., ESQ.**
:

Plaintiff provides notice of his intent to oppose the motion for *pro hac vice* admission of Joshua Thomas, Esq. in this action. Mr. Thomas filed his motion on July 20, 2021 (ECF No. 25). Plaintiff intends to file a response in opposition to the motion on or by August 3, 2021, two weeks from the filing of the *pro hac vice* motion.

Dated: July 20, 2021

Respectfully submitted,

/s/ Avi R. Kaufman

KAUFMAN PA

Avi R. Kaufman

400 Northwest 26th Street

Miami, Florida 33127

305-469-5881

kaufman@kaufmanpa.com

PARONICH LAW, P.C.
Anthony I. Paronich
350 Lincoln St., Suite 2400
Hingham, MA 02043
617-485-0018
anthony@paronichlaw.com

Attorneys for Plaintiff and proposed class